

EXHIBIT 8

Kate White

From: Kate White
Sent: Tuesday, February 14, 2023 1:33 PM
To: 'Gonzalez, Ernest (USATXE)'
Cc: Joe White; Matthew Cyran
Subject: USA vs. Mercer-Erwin- Discovery

Mr. Gonzalez,

This email is written regarding the discovery letter written by Mr. Cyran dated June 13, 2022, our phone conversation of Monday, February 6, 2023 and Fed. Crim. Pro. Rule 16 (1)(B). As we discussed, we have concerns regarding the process in which discovery has been produced in this case. As you know there is 12 TB of data to mine through. I am at a loss as to how to determine if everything has been produced. For instance, I have diligently searched for Mrs. Mercer-Erwin's recorded interviews and any associated notes of said interviews, specifically interviews of December 18, 2020, December 22, 2020, December 29, 2020, January 21, 2021 and January 22, 2021, and have not found any recordings of the referenced interviews or Agent notes. Therefore, please provide me with a copy of any recorded interview and associated notes of Mrs. Mercer-Erwin in the government's control or custody. Also, I have found a few recordings made by Machado of Mrs. Mercer-Erwin, but I have not found the recording made by Mrs. Mercer-Erwin of Machado that you referenced in our phone call. Please confirm that all recording by and/or of Machado and/or Mrs. Mercer-Erwin have been produced. Additionally, are there any recordings documenting the accuracy of the various 302/ROI interviews?

Also, it is my understanding that there has not been an expert witness disclosed by the government. If an expert witness was disclosed to previous counsel for Mrs. Mercer-Erwin, please provide me the name and contents of the disclosure(s) that was previously made.

Finally, it was represented to us that there may be another discovery production coming. Please confirm if there is more discovery on the way or not. If there is, given the impending trial date, please advise when we can expect to receive it.

If you have any questions or would like to discuss my request, please contact me.

Thank you,
Kate White

Kate C. White, Esq.
WHITE & WEDDLE, P.C.
630 N.E. 63rd Street
Oklahoma City, OK 73105
(405) 858-8899
(405) 858-8844 FAX
kate@whiteandweddle.com
www.whiteandweddle.com